

In the  
Supreme Court of Ohio

STATE OF OHIO, : Case Nos. 2008-0853;  
 : 2008-0858  
 :  
 Plaintiff-Appellant, :  
 :  
 v. : On Appeal from the  
 : Mahoning County  
 : Court of Appeals,  
 JESSICA DEROV, : Seventh Appellate District  
 :  
 :  
 Defendant-Appellee. : Court of Appeals Case  
 : No. 07 MA 71

---

**MOTION TO ADMIT MICHAEL DOMINIC MEUTI *PRO HAC VICE*  
TO REPRESENT *AMICUS CURIAE* OHIO ATTORNEY GENERAL  
NANCY H. ROGERS**

---

PAUL J. GAINS (0020323)  
Mahoning County Prosecutor

RALPH M. RIVERA\* (000082063)  
Assistant Prosecutor  
*\*Counsel of Record*  
21 West Boardman Street, 6th Floor  
Youngstown, Ohio 44503  
330-740-2330  
330-740-2008 fax

Counsel for Plaintiff-Appellant  
State of Ohio

ROBERT C. KOKOR (0062326)  
394 State Route 7  
P.O. Box 236  
Brookfield, Ohio 44403  
330-448-1133

Counsel for Defendant-Appellee  
Jessica Derov

NANCY H. ROGERS (0002375)  
Attorney General of Ohio

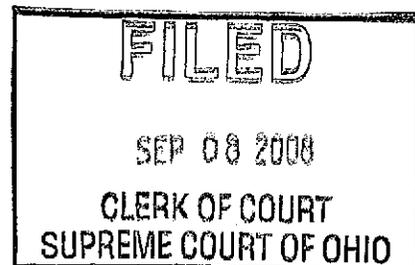
BENJAMIN C. MIZER\* (0083089)  
Solicitor General  
*\*Counsel of Record*

MICHAEL DOMINIC MEUTI (*pro hac vice*  
*application pending*)

Deputy Solicitor  
JASON PATRICK SMALL (0080151)  
Assistant Solicitor

30 East Broad Street, 17th Floor  
Columbus, Ohio 43215  
614-466-8980  
614-466-5087 fax  
bmizer@ag.state.oh.us

Counsel for *Amicus Curiae*  
Ohio Attorney General Nancy H. Rogers



**MOTION TO ADMIT MICHAEL DOMINIC MEUTI *PRO HAC VICE*  
TO REPRESENT *AMICUS CURIAE* OHIO ATTORNEY GENERAL  
NANCY H. ROGERS**

In accordance with Supreme Court Practice Rule I, Section 2, Benjamin C. Mizer (Ohio Bar No. 0083089) moves the Court to admit Michael Dominic Meuti to appear on behalf of and represent *pro hac vice Amicus Curiae* Ohio Attorney General Nancy H. Rogers in the above-captioned matter, stating the following grounds:

1. Mr. Meuti is a Deputy Solicitor in Ohio Attorney General Nancy H. Rogers's Office, located at 30 East Broad Street, 17th Floor, Columbus, Ohio 43215.

2. Mr. Meuti graduated from the Stanford Law School in 2003.

3. Mr. Meuti is admitted to the bar of the State of California. He is also admitted to practice in the United States Courts of Appeals for the Sixth and Ninth Circuits. He is a member in good standing of each of these bars.

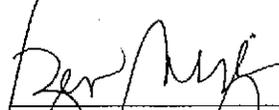
4. Mr. Meuti has participated in cases on behalf of clients in both state and federal courts.

5. This Court recently admitted Mr. Meuti *pro hac vice* in *Frisch's Restaurants, Inc. et al. v. James G. Conrad [Marsha P. Ryan], Administrator, Ohio Bureau of Workers' Compensation*, No. 2007-0544.

WHEREFORE, Benjamin C. Mizer respectfully requests that this Court admit Michael Dominic Meuti *pro hac vice* for the purpose of representing *Amicus Curiae* Ohio Attorney General Nancy H. Rogers in the above-captioned matter.

Respectfully submitted,

NANCY H. ROGERS (0002375)  
Attorney General of Ohio



BENJAMIN C. MIZER\* (0083089)  
Solicitor General

*\*Counsel of Record*

MICHAEL DOMINIC MEUTI (*pro hac vice  
application pending*)

Deputy Solicitor

JASON PATRICK SMALL (0080151)

Assistant Solicitor

30 East Broad Street, 17th Floor

Columbus, Ohio 43215

614-466-8980

614-466-5087 fax

[bmizer@ag.state.oh.us](mailto:bmizer@ag.state.oh.us)

Counsel for *Amicus Curiae*

Ohio Attorney General Nancy H. Rogers

## CERTIFICATE OF SERVICE

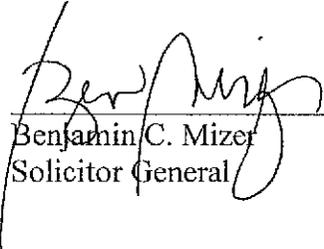
I certify that a copy of the foregoing Motion to Admit Michael Dominic Meuti *Pro Hac Vice* to Represent *Amicus Curiae* Ohio Attorney General Nancy H. Rogers was served by U.S. mail this 8th day of September, 2008, upon the following counsel:

Paul J. Gains  
Mahoning County Prosecutor  
Ralph M. Rivera  
Assistant Prosecutor  
21 West Boardman Street, 6th Floor  
Youngstown, Ohio 44503

Counsel for Plaintiff-Appellant  
State of Ohio

Robert C. Kokor  
394 State Route 7  
P.O. Box 236  
Brookfield, Ohio 44403

Counsel for Defendant-Appellee  
Jessica Derov



---

Benjamin C. Mizer  
Solicitor General